

THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Nicholas Zindel Epps
Debtor

CASE NO. 21-10317-MDC

Nicholas Zindel Epps,
Movant
v.

CHAPTER 13

Pennymac Loan Services, LLC,
Respondent

and

William C. Miller, Esquire
Chapter 13 Trustee

**STIPULATION REGARDING PAYMENT OF CLAIM 8 BY AND BETWEEN
DEBTOR AND PENNYMAC LOAN SERVICES, LLC**

THIS matter being opened to the Court by way of claim no. 8 filed by Pennymac Loan Services, LLC by way of its counsel at KML Law Group, P.C. and the proposed amended plan filed by Debtor by way of his counsel Joseph Quinn of Ross, Quinn, & Ploppert, P.C.,

The Parties agree to the following:

1. On March 31, 2021 Pennymac Loan Services, LLC ("Pennymac") filed a valid claim, marked as claim no. 8, secured by Debtor's real estate known as 3 East Brown Street, Norristown, PA 19401.
2. Pennymac's claim reflects pre-petition arrearage of \$16,881.90.
3. Prior to the filing of the petition, Debtor and Pennymac Loan Services, LLC had entered into a COVID-19 loan forbearance that did not require Debtor to pay the \$1,542.03 monthly payment ordinarily due on March 1, 2021 and April 1, 2021.
4. Debtor subsequently proposed a plan that repays Pennymac the \$16,881.90 in pre-petition arrears and \$3084.06 in post-petition arrears due Pennymac.

5. Pennymac agrees to repayment of the \$3,084.06 in post-peition arrears in the plan for total payment of \$19,965.96.

6. Pennymac shall not be required to amend its claim to receive the payment of \$19,965.96 from the plan.

7. The undersigned attorneys have authority to sign such stipulation on behalf of the respective Party.

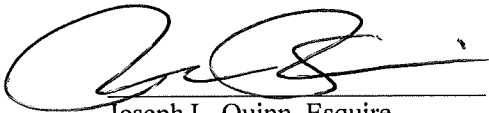
8. Electronic signature and/or facsimile of signatures are acceptable and valid signatures.

/s/Rebecca A. Solarz

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
rsolarz@kmlawgroup.com
Tel: (215) 825-6327
Attorney for PennyMac Loan Services, LLC

6/16/2021

Date



Joseph L. Quinn, Esquire
Ross, Quinn & Ploppert, P.C.
Tel: (610) 323-5300
jqquinn@rqplaw.com
Attorney for Debtor

6/17/2021
Date

No Objection - Without Prejudice to
Any Trustee Rights or Remedies

/s/ LeeAne O. Huggins

LeeAne O. Huggins, Esquire
for William C. Miller
Chapter 13 Standing Trustee
mdc@ph13trustee.com
Phone: (215) 627-1377

June 21, 2021

Date

And it is SO ORDERED:

MAGDELINE D. COLEMAN
CHIEF U.S. BANKRUPTCY JUDGE